

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VOLTERRA SEMICONDUCTOR
LLC,

Plaintiff,

V.

MONOLITHIC POWER SYSTEMS,
INC.,

Defendant.

Redacted - Public Version

CA No 19-2240-CFC-SRF

**DECLARATION OF BOB STEINBERG IN SUPPORT OF
DEFENDANT MONOLITHIC POWER SYSTEMS, INC.'S
MOTIONS FOR SUMMARY JUDGMENT (NOS. 1-3)**

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Dated: November 19, 2021

1. I, Bob Steinberg, am an attorney with Latham & Watkins LLP, admitted *pro hac vice* before this honorable Court to represent defendant Monolithic Power Systems, Inc. (“MPS”) in this matter. I provide this declaration based on my personal knowledge.

2. Attached as Exhibit 1 is a true and correct copy of a [REDACTED]
[REDACTED] which was produced in this litigation by Volterra as MAXIM_00011579.

3. Attached as Exhibit 2 is a true and correct copy of excerpts from Volterra’s proposed First Amended Disclosure of Asserted Claims and Infringement Contentions, which was filed under seal by Volterra as D.I. 166, Ex. R.

4. Attached as Exhibit 3 is a true and correct copy of a letter dated October 11, 2021 from MPS to Volterra.

5. Attached as Exhibit 4 is a true and correct copy of a letter dated November 1, 2021 from Volterra to MPS.

6. Attached as Exhibit 5 is a true and correct copy of excerpts from Volterra’s Disclosure of Asserted Claims and Infringement Contentions.

7. Attached as Exhibit 6 is a true and correct copy of excerpts from Volterra's Second Supplemental Objections and Responses to Defendant's First Set of Interrogatories to Plaintiff (Nos. 1-6).

8. Attached as Exhibit 7 is a true and correct copy of MPS's Fifth Supplemental Objections and Responses to Volterra's Interrogatories (Nos. 1-28).

9. Attached as Exhibit 8 is a true and correct copy of U.S. Patent No. 6,362,986, which was produced in this litigation by Volterra as MAXIM_00007958.

10. Attached as Exhibit 9 is a true and correct copy of U.S. Patent No. 7,525,408, which was produced in this litigation by Volterra as MAXIM_0008037.

11. Attached as Exhibit 10 is a true and correct copy of U.S. Patent No. 7,772,955, which was produced in this litigation by Volterra as MAXIM_00008082.

12. Attached as Exhibit 11 is a true and correct copy of excerpts from the transcript of Roland Tso's Deposition, which was taken on September 2, 2021.

13. Attached as Exhibit 12 is a true and correct copy of excerpts from an email dated December 11, 2018 from Eaton to MPS, which was produced in this litigation by MPS as MPS_DE-00010032.

14. Attached as Exhibit 13 is a true and correct copy of [REDACTED]
[REDACTED] which was produced in this litigation by MPS as MPS_DE-00010348.

15. Attached as Exhibit 14 is a true and correct copy of excerpts from the transcript of Daocheng “Dawson” Huang’s Deposition, which was taken on August 30, 2021.

16. Attached as Exhibit 15 is a true and correct copy of excerpts from the transcript of Rizwan Khalid’s Deposition, which was taken on August 23, 2021.

17. Attached as Exhibit 16 is a true and correct copy of [REDACTED]
[REDACTED] which was produced in this litigation by Volterra as MAXIM_00013678.

18. Attached as Exhibit 17 is a true and correct copy of excerpts from the transcript of Ahmed Abou-Alfotouh’s Deposition, which was taken on September 9, 2021.

19. Attached as Exhibit 18 is a true and correct copy of an email from Rizwan Khalid to Ahmed Abou-Alfotouh, which was produced in this litigation by Volterra as MAXIM_00013677.

20. Attached as Exhibit 19 is a true and correct copy of excerpts from Jinghai Zhou’s Dissertation, which was produced in this litigation by Volterra as MAXIM_00011320.

21. Attached as Exhibit 20 is a true and correct copy of excerpts from the transcript of Jinghai Zhou's Deposition, which was taken on September 3, 2021.

22. Attached as Exhibit 21 is a true and correct copy of Yan Dong's LinkedIn page.

23. Attached as Exhibit 22 is a true and correct copy of an email dated March 16, 2018 from Delta to MPS, which was produced in this litigation by Delta as DAL0000001.

24. Attached as Exhibit 23 is a true and correct copy of excerpts from the Expert Report of James Dickens, P.E. Regarding Infringement of U.S. Patent Nos. 6,362,986, 7,525,408 and 7,772,955.

25. Attached as Exhibit 24 is a true and correct copy of excerpts from Yan Dong's Dissertation, which was produced in this litigation by Volterra as MAXIM_00010715.

26. Attached as Exhibit 25 is a true and correct copy of the Annotated Patents Digest, Section 10:36 - Basic elements of inducing infringement.

27. Attached as Exhibit 26 is a true and correct copy of excerpts from the September 10, 2020 Scheduling Conference Transcript.

28. Attached as Exhibit 27 is a true and correct copy of the file history for U.S. Patent No. 6,362,986, which has been produced in this litigation by Volterra as MAXIM_00006448.

29. Attached as Exhibit 28 is a true and correct copy of an article titled “Investigating Coupled Inductors in the Interleaving QSW VRM” by Pit-Leong Wong et al., which has been produced in this litigation by MPS as MPS_DE-00001780.

30. Attached as Exhibit 29 is a true and correct copy of excerpts from the Joint Claim Construction Brief filed on June 21, 2021, which is D.I. 168 in the docket sheet.

31. Attached as Exhibit 30 is a true and correct copy of excerpts from the transcript of Aaron Schulz’s Deposition, which was taken on September 3, 2021.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on November 19, 2021.

/s/ Bob Steinberg

Bob Steinberg

CERTIFICATE OF SERVICE

I, Nathan R. Hoeschen, hereby certify that on November 19, 2021, this document was served on the persons listed below in the manner indicated:

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